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8 Attorneys for Thomas W. McNamara,
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9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 THOMAS W. MCNAMARA, as the Court-
13 Appointed Monitor,¹

14 Plaintiff,

15 vs.

16 CHARLES M. HALLINAN, an individual;
HALLINAN CAPITAL CORP., a Delaware
17 corporation; DOES I-X; and ROE
CORPORATIONS I-X,

18 Defendants.
19

Case No.: 2:17-cv-002966-KJD-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
DEFENDANTS' MOTION TO
DISMISS PLAINTIFF'S
COMPLAINT OR, IN THE
ALTERNATIVE, STAY THE
PROCEEDINGS**

FIRST REQUEST

20 Plaintiff and Defendants stipulate and agree as follows:

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24 ¹ Mr. McNamara is acting in his capacity as the Court-Appointed Monitor for AMG
Capital Management, LLC; BA Services LLC; Black Creek Capital Corporation; Broadmoor Capital
25 Partners, LLC; Park 269, LLC; C5 Capital LLC; DF Services Corp.; DFTW Consolidated [UC]
LLC; Impact BP LLC; Level 5 Apparel LLC; Level 5 Capital Partners LLC; Level 5 Eyewear LLC;
26 Level 5 Motorsports, LLC; Level 5 Scientific LLC; NM Service Corp. (f/k/a/ National Money
Service); PSB Services LLC; Real Estate Capital LLC (f/k/a/ Rehab Capital I, LLC); Sentient
27 Technologies; ST Capital LLC; Westfund LLC; Eclipse Renewables Holdings LLC; Scott Tucker
Declaration of Trust, dated February 20, 2015; West Race Cars, LLC; and Level 5 Management
28 LLC; and their successors, assigns, affiliates, and subsidiaries.

1 WHEREAS, Defendants Charles Hallinan and Hallinan Capital Corp.'s Motion to Dismiss
2 Plaintiff's Complaint or, in the Alternative, Stay the Proceedings (the "Motion to Dismiss") was
3 filed on January 29, 2018 (ECF No. 17);

4 WHEREAS, Plaintiff's deadline to file its response to the Motion to Dismiss is currently
5 February 12, 2018; and

6 WHEREAS, the parties stipulate, subject to Court approval, that Plaintiff's deadline to file its
7 response to the Motion to Dismiss shall be extended by 4 weeks, to March 12, 2018.

8 Dated February 9, 2018.

Dated February 9, 2018.

9 SEMENZA KIRCHER RICKARD

LYNCH LAW PRACTICE, PLLC

10
11 /s/ Jarrod L Rickard

/s/ Michael F. Lynch

12 Lawrence J. Semenza, III, Esq.

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20 **IT IS SO ORDERED.**

21 

22 _____
23 UNITED STATES

UDGE

24 Dated:

25 March 14, 2018
26
27
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